

WHITEHOUSE DECLARATION

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UNITED AIR LINES, INC.
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10 BEFORE THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL

11 ENVIRONMENTAL PROTECTION AGENCY

12 STATE OF CALIFORNIA

13 In the Matter of the
14 Investigation of:

) File No. _____
)

15 BAY AREA DRUM SITE
16 _____

) DECLARATION OF L.T. WHITEHOUSE
)

17 I, L.T. Whitehouse, hereby declare:
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19 1. I am presently employed by United Air Lines, Inc.
20 ("United") as Lead Mechanic, Plant Maintenance Plumbing Department,
21 at the San Francisco Maintenance Operations Center, South Airport
22 Boulevard, South San Francisco, California (the "MOC"). I have
23 been employed by United at the MOC continuously since January,
24 1962. I make the following statements based upon my own personal
25 knowledge and, if called as a witness, could and would competently
26 testify thereto.
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1 2. During the period beginning on about January, 1980
2 through the present date, my job duties for United have included,
3 among other things, supervising the handling and recycling of empty
4 drums and preparing hazardous waste manifests.

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6 3. Personnel at the MOC repair, service and overhaul
7 the entire fleet of aircraft operated by United. For this purpose,
8 the MOC central stores department acquires and stores 55-gallon
9 drums of soaps, solvents (1, 1, 1 trichloroethane, paint stripper
10 which contains methylene chloride, and tetrachloroethylene
11 (perchloroethylene)), Allodine solutions, caustics and oils
12 (collectively, the "Drummed Materials"). These materials are
13 transported from a central storage area and delivered to
14 workstations. Once these materials have been used, empty drums are
15 moved to a staging area to await processing by Plumbing Department
16 personnel under my supervision.

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18 4. During the years 1980 through 1983, inclusive,
19 Plumbing Department personnel under my supervision processed empty
20 drums according to the following procedure:

21
22 a. Each empty drum was rinsed with water, and the
23 rinsings dumped into Rinsings Drums, segregated by the type of
24 material originally stored in the drums being rinsed.

25
26 b. Once rinsed, each clean drum was stacked in the
27 clean-drum storage area. Some of the clean drums were used by
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1 personnel at the MOC for various functions, such as accumulation of
2 soiled rags and waste fluids. As empty, clean drums accumulated in
3 quantities sufficient to fill the clean-drum storage area, United's
4 surplus sales department ("Surplus Sales") would arrange for Bay
5 Area Drum Company ("BADC") to pick up and purchase the drums.
6 Within several days after such notice, BADC would dispatch a truck
7 to the MOC, and the driver would select the clean drums BADC chose
8 to purchase and load the selected drums onto BADC's truck. Within
9 several days after picking up the clean drums, BADC would pay by
10 check submitted to Surplus Sales.

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12 c. The rinsings contained in the Rinsings Drums
13 were pumped into transfer tanks operated by various licensed
14 hazardous waste haulers and, along with other waste liquids,
15 transported to permitted hazardous waste disposal sites or
16 treatment facilities, as appropriate. I prepared hazardous waste
17 manifests ("Hazardous Manifests") in accordance with applicable
18 laws and regulations which document such transport and disposal.
19 The Hazardous Manifests are maintained by United and are available
20 for inspection at the MOC by authorized governmental entities upon
21 request.

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23 d. To my best knowledge, and based upon my
24 periodic visual inspection, the drums United sold to BADC were
25 clean and, with the sole exception of drums originally containing
26 petroleum-based lubricants, contained no visible residues. A de
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1 minimis amount of petroleum-based lubricant residue clung to the
2 walls of the drums.

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4 5. To my best knowledge, during the years 1980 through
5 1983, inclusive, United did not, and United does not currently,
6 purchase in 55-gallon drums any materials containing PCBs or
7 pesticides.

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9 I declare under penalty of perjury under the laws of the
10 State of California that the foregoing is true and correct.

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12 Executed on February 10, 1992 at San Francisco,
13 California.

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16 L.T. Whitehouse
17 L.T. Whitehouse
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